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June 18, 2019

BY ECF, US MAIL AND FACSIMILE

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007
Fax: (212) 805-7942

Re: Jane Doe v. Halstead Property, LLC et al, Civil Docket No. 1:18-cv-05436-AKH

Honorable Sir:

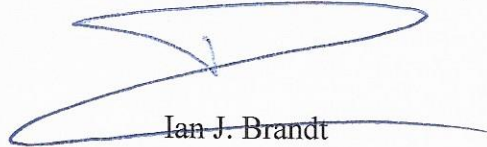
This office represents Plaintiff Jane Doe in the above-referenced action. We write in connection with the Defendants' failure to comply with their discovery obligations and failure to otherwise communicate with this office, despite our several good-faith attempts to do so.

The parties appeared for a case management conference before Your Honor on January 25, 2019, at which time the Court approved a Case Management Plan ("CMP") setting forth a schedule for discovery, which is attached hereto. Since that time, Plaintiff timely produced voluminous responsive documents, interrogatory responses, HIPAA releases, and other information demanded by the Defendants in compliance with the CMP.

Defendants, however, have failed to produce any paper discovery, and Defendants' counsel, Andrew Saulitis, has stopped communicating with my office altogether. The last communication this office received from Mr. Saulitis was on March 5, 2019, when he transmitted copies of Defendants' formal discovery responses, but without any production of documents. We wrote in good-faith to Mr. Saulitis on both April 24 and May 21, 2019, in advance of the deadlines for the completion of depositions in order to conference the matter but have received no response. My associate, Niki Khindri, then left a message with Mr. Saulitis' office on June 13, 2019, requesting a callback, but none has been received.

Importantly, Plaintiff cannot schedule depositions of party witnesses, or any witnesses for that matter, without a meaningful opportunity to review Defendants' documents and other discovery. Given their noncompliance with the CMP's discovery deadlines, we are now compelled to seek the Court's intervention to compel Defendants' responsiveness and compliance with their discovery obligations, subject to preclusion penalties.

Respectfully submitted,



Ian J. Brandt

cc:

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The Honorable Debra Freeman (by ECF)
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